

Heritage Strategy

2024-26





Artwork from Luke Duffy

We acknowledge and embrace a culture that celebrates diversity, inclusion, and equality for all. In making this statement we acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of the country on which we live and work, now called Australia.

Front cover image:
Melbourne Area and Approach Control Centre, 1981: Peter Carroll
Source: Civil Aviation Historical Society collection

Statement from the Interim Chief Executive Officer



Changes to aviation processes over the next three years will include the ongoing roll-out of the OneSKY programme to harmonise civil and military airspace and the completion of Western Sydney International Airport at Badgerys Creek - the first ground-up airport in Australia to feature a Digital Aerodrome Service rather than a bricks-and-mortar control tower.

Looking further into the future, the management of Australia's airspace will become more complex with the rapid growth of uncrewed aerial vehicles and the further adoption of digital technologies. Throughout these changes Airservices remains committed to identifying and recording the heritage value of our infrastructure.

Our Heritage Strategy details how we assess our operations for their heritage value and manage assets that are identified as being of historical significance. This document also provides clear guidance to our managers and staff on how to ensure that Airservices heritage assets are recognised, promoted, and valued in our organisation.

The aviation industry has a long and proud history in Australia. The sector is dynamic and fast-evolving, and the pace of change has only accelerated since the pandemic as volumes have rapidly recovered. Australia's aviation landscape is rich with artifacts of processes and equipment that were once integral to air transport, and Airservices has an integral role to play in the conservation of Australian aviation heritage.

Since 2007, Airservices has undertaken national heritage assessments of air traffic control towers, aviation rescue firefighting stations, aeradio/flight centres, and air navigational aids. Our priorities for the next three years will be to focus on completing the national heritage survey of radar facilities, and to review and update Heritage Management Plans for the six air traffic control towers listed on the Commonwealth Heritage Register.

Rob Sharp
Interim Chief Executive Officer

Oblique aerial view of Melbourne-Tullamarine air traffic control tower, 1970s, during works to extend the Operations Centre.
Source: Civil Aviation Historical Society



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Perth Air Traffic Control no. 2, 1986: a refined and elegant example of the cabin-on-a-slender-concrete-shaft tower type first seen in Australia in the late 1960s.
Source: Civil Aviation Historical Society



Table of abbreviation and acronyms

Abbreviation/acronym	Full name/title
ATC	Air Traffic Control
CHL	Commonwealth Heritage List
EMS	Environmental Management System
EPBC Regulations	Environment Protection and Biodiversity Conservation Regulations 2000
HMP	Heritage Management Plan
ICOMOS	International Council on Monuments and Sites



Airside view of Parafield Ops & Admin building (ATC Tower no. 2), 1949.
Source: Civil Aviation Historical Society

1.0 Introduction

Airservices Australia (Airservices) is a government-owned organisation (Commonwealth entity) that provides telecommunications, aeronautical data, air navigation and aviation rescue and firefighting services to the aviation industry. Our objectives are to enable the safe, secure, efficient and environmentally responsible operation of the industry. Our operations are governed by the *Air Services Act 1995*, and other relevant Commonwealth legislation. Airservices is a Commonwealth agency for the purposes of the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*.

In the delivery of our services, we own and/or manage over 1,000 buildings and places across Australia. A number of these places, including air traffic control towers (ATC towers) and navigational aids (navaids), have been assessed as having (or potentially having) Commonwealth Heritage values.

Our first Heritage Strategy was prepared in 2010, in accordance with Section 341ZA of the EPBC Act and Schedule 7C of the Environment Protection and Biodiversity Conservation Regulations 2000 (EPBC Regulations). As required under the EPBC Act and its Regulations, the strategy must be updated every three years.

This Heritage Strategy (2024-26) updates the 2021-2023 document, and includes:

- reference to Airservices' corporate structure;
- a review of Airservices' heritage assessment programmes, and associated timeframes;
- strategies for the management of Airservices heritage assets; and
- information on internal systems, policies and training policies that ensure compliance with the legislation.

Each section of this Heritage Strategy provides an overview of the specific requirements outlined in the EPBC Regulations, and where relevant, strategies for implementation during the 2024-26 period.

This Strategy has been prepared in accordance with *Preparing a Heritage Strategy: A guide for Commonwealth agencies* (Commonwealth Department for the Environment, Water, Heritage and the Arts, 2010) and *Working Together: Managing Commonwealth Heritage Places, A guide for Commonwealth Agencies* (Commonwealth of Australia, 2019).

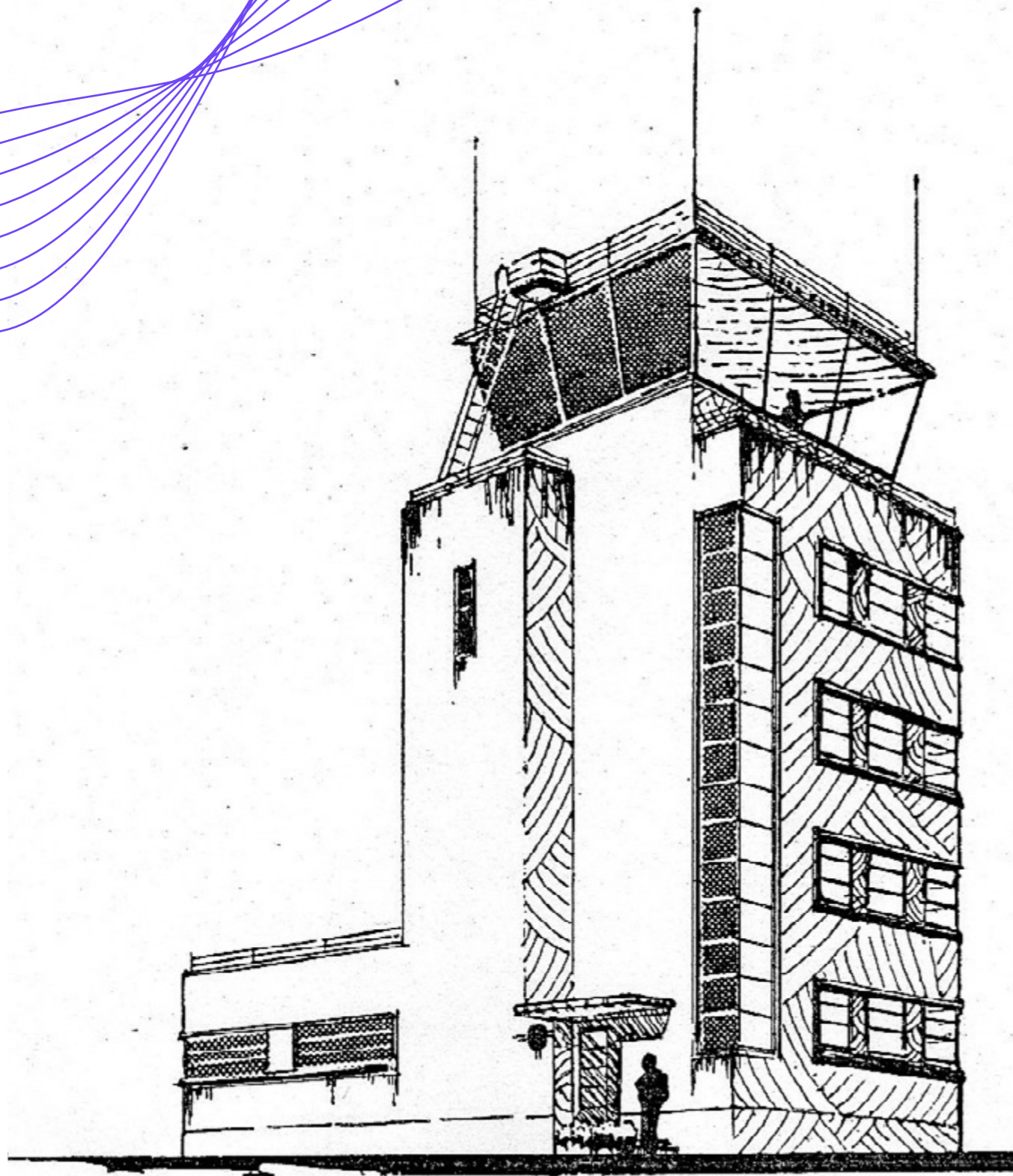
2.0 Corporate framework and general matters

Airservices' commitment to identifying, managing and protecting Commonwealth Heritage values and Commonwealth Heritage places is incorporated into our corporate governance through our Environmental Management System (EMS). The EMS is aligned to the international standard on environment management - AS/NZS ISO 14001:2015 and is described in more detail at Section 2.2.1.

The protection of the environment, which includes heritage, is an important function of Airservices' activities. This is reflected in the *Air Services Act 1995*, our strategic priorities and our environmental policy.

The EPBC Regulations, Schedule 7C, s 1 set out the general matters that must be included in a Heritage Strategy. Table 1 indicates where these general matters are addressed in this document.

EPBC Regulations, Schedule 7C, s 1	Section reference
A statement of the agency's objective for management of its heritage places	2.1
A description of how the heritage strategy operates within the agency's corporate planning framework	2.2
A list of key positions within the agency, the holders of which are responsible for heritage matters	2.3
An outline of a process for consultation and liaison with other government agencies on heritage matters	2.4.1
An outline of a process for consultation and liaison with the community on heritage matters, including, in particular, a process for consultation and liaison with Indigenous stakeholders on Indigenous heritage matters	2.4.2
An outline of a process for resolution of conflict arising from the assessment and management of Commonwealth Heritage values	2.5
An outline of processes for monitoring, reviewing and reporting on the implementation of an agency's heritage strategy	2.6



Perspective of air traffic control tower proposed for Essendon Airport, 1951: the first of a major phase of control towers development in the post-World War II period.
Source: Civil Aviation Journal, June 1951 (copy held by the Civil Aviation Historical Society)

2.1 Objective

As a Commonwealth entity, we recognise our responsibility to identify, manage, protect and promote the Commonwealth Heritage values of the places we own and control, consistent with best practice in conservation and environmental management.

2.2 Operation of the Heritage Strategy

The Airservices Corporate Plan of 2023–2024 identifies the key purposes of the agency as follows:

- 01 Provide facilities and services for the safety, regularity and efficiency of air navigation within Australian-administered airspace. This includes providing air traffic services, aviation rescue fire fighting services, aeronautical information, radio navigation and telecommunications services.
- 02 Promote and foster civil aviation in Australia and overseas.

In addition, our Environmental Policy makes the following commitment with regard to heritage:

We will identify and protect the heritage values of places Airservices controls or potentially impacts; and assist in the protection and promotion of historical aviation values.

The deliverables identified by each functional area and outputs required to deliver on the Corporate Plan are reported and reviewed monthly by the Airservices Executive group. Each part of the Airservices value chain must also perform its duties in a manner that is consistent with our environmental policy, improving the environmental sustainability of the organisation, while enhancing environmental outcomes for its customers and stakeholders.

The Heritage Strategy is integrated with Airservices' corporate EMS, and all Airservices corporate business groups must conform with the EMS. The development and implementation of Airservices' Heritage Strategy and conformance with the EMS (including management of heritage issues) is the responsibility of the 'Environment and Sustainability' function within the Office of Safety and Risk.

2.2.1 Environmental Management System

Airservices maintains an EMS as a framework of documentation, processes and tools to guide the organisation in satisfying our legislative and regulatory obligations. The EMS applies to all activities, products and services we undertake to manage environmental risks and to continuously improve environmental performance.

Under the EMS framework, the Environmental Performance Requirements and Controls for Airservices Infrastructure national operating standard provides a set of standard controls for heritage that is to be applied across the organisation.

Proposed changes to any Airservices activities must be assessed for potentially significant environmental impacts and managed in accordance with the Airservices Environmental Management of On-Ground Changes national operating standard. Under the standard, we are required to identify any potentially significant environmental impacts, including heritage, and assess any potential impacts prior to the implementation of the change, in accordance with Airservices' EMS and the EPBC Act.

An Environmental Change Screening Checklist includes a section on heritage and stipulates that, where required, further assessment will be undertaken to determine if an Environmental Impact Assessment (EIA) or heritage assessment is required. If the on-ground change is assessed as having a 'potentially significant impact' on Commonwealth Heritage values, the proposed change may have to be referred to the Commonwealth Minister for the Environment and Water.

It is noted that the EPBC Act has recently undergone an independent review. Subject to a government response, we will monitor any future changes to the heritage provisions of the EPBC Act and communicate to staff where relevant.

A program plan will be developed to deliver on the strategic actions identified within this document to enact the Strategy.

2.2.2 Strategy implementation and actions

Strategy implementation	Actions
We will include heritage strategy planning in the annual cycle of Airservices business planning and monitor the strategy via governance arrangements in our EMS	Continue to integrate our obligations under the EPBC Act and this Heritage Strategy into Airservices business planning, the EMS and the associated standards, guides and policies
	Identify an annual budget for the management of Airservices property with Commonwealth Heritage values
	Review any future changes to heritage-related legislation and, where relevant, update the EMS and capture in a register, available to all staff via the intranet

2.3 Key positions responsible for heritage matters

Environmental and heritage services have a joint responsibility that sits under the Director - Safety, Security & Environment Assurance and the Chief Operating Officer. Airservices staff with operational environmental responsibilities are situated under the Chief Operating Officer, while the management of our Environment Management System (EMS development, assurance and continuous improvement) sits under the Director - Safety, Security & Environment Assurance.

In keeping with the EPBC Act, we consider 'heritage' to be an aspect of the 'environment'.

The environmental management responsibilities of key Airservices staff (including heritage matters) are described in our Executive Environmental Management Accountabilities national operating standard.

Table 2 below identifies key positions within Airservices and associated responsibilities in relation to heritage matters.

Position	Heritage responsibilities
Airservices Board	Airservices Board is responsible for endorsing the environment policy governing environmental management, including heritage management.
Chief Executive Officer (CEO)	The CEO is responsible for providing support to the Board of Directors to assist them to discharge their responsibility in relation to environmental policy and corporate governance documentation. The CEO is responsible for the implementation and maintenance of the environment policy and does this by directing and delegating tasks at the corporate level to appropriate areas within the corporation. A further responsibility is for the submission of a triennial review of the Heritage Strategy to the Australian Government Minister for the Environment (Environment Minister). A copy of this report will also be provided to the Minister for Infrastructure, Transport and Regional Development.
Chief Financial Officer	The Chief Financial Officer has accountability for all property and project management, and associated implementation in relation to the Heritage Strategy. The Chief Financial Officer has accountability for all Airservices finances and is therefore responsible for ensuring that sufficient resources are included in our annual budget to adequately cover ongoing heritage management obligations.
Chief Safety and Risk Officer	The Chief Safety and Risk Officer is responsible for assurance that we are meeting our environmental, including heritage, obligations. As part of the Environment and Sustainability function, the Chief Safety and Risk Officer is to provide reports to the CEO and the Board on whether Airservices is managing the environment (and heritage matters) responsibly. The position is responsible for ensuring that a review is undertaken of the Heritage Strategy every three years, and that the Heritage Strategy is updated as required (this update).
Chief Service Delivery Officer	The Chief Service Delivery Officer has accountability for maintaining facilities and equipment associated with all properties. The position is responsible for ensuring that all properties with identified Commonwealth Heritage values are protected and maintained by all facility and maintenance personnel.

Table 2 - Key positions and associated responsibilities for heritage matters at Airservices

Position	Heritage responsibilities
Chief Customer Experience & Strategy Officer	The Chief Customer Experience & Strategy Officer has accountability for enhancing our understanding of customer expectations and value from Airservices. The position is responsible for engaging with customers, airports and the broader aviation industry in relation to any heritage matters, which may affect service delivery to our customers.
Environment & Sustainability Principal Advisor	The Environment & Sustainability Principal Advisor is accountable to the Chief Safety and Risk Officer for the development and maintenance of an effective EMS across Airservices, and for monitoring and reporting on the environmental performance of the organisation to the Airservices Board. The Principal Advisor is responsible for assisting our operations in meeting environmental obligations and the provision of advice to reduce environmental risk and the protection of heritage values.
Project and Asset Managers	The Airservices Project Managers are responsible for complying with EMS protocols and ensuring heritage matters are adequately incorporated into our capital works planning, project planning and management activities (including environmental assessments).
All managers	All managers are accountable for environmental performance in their areas of responsibility.

2.3.1 Strategy implementation and actions

Strategy implementation	Actions
Key positions responsible for heritage are designated and reflected in relevant national operating standards	Ensure that our EMS continues to reflect the accountabilities and responsibilities required for effective implementation of the Heritage Strategy.

2.4 Consultation regarding heritage matters

Under Section 9(2) of the *Air Services Act 1995*, Airservices has an obligation to 'exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, the environment is protected from the effects associated with operations and use of aircraft'. Section 9(1) of this Act also states that 'in exercising its powers and performing its functions, Airservices must regard the safety of air navigation as the most important consideration'.

We are committed to complying with all Commonwealth environmental legislation and with all relevant State, Territory and Local Government environmental legislation, as applicable, and engaging with key stakeholders and the community. In addition to the following outline of consultation regarding heritage matters, Airservices Environmental Management System Objectives and Requirements national operating standard sets out our approach to communication and consultation.

2.4.1 Government agencies

We are committed to consulting with relevant Commonwealth, State/Territory and Local Government agencies in the implementation of this Heritage Strategy, and in relation to the assessment of places we own and control, which have Commonwealth Heritage values (details of Commonwealth, State and Territory heritage legislation are detailed within the table below).

In addition, where heritage values are likely to be significantly impacted by an action undertaken by Airservices, the relevant statutory authorities will be consulted - namely, this will trigger a referral to the Commonwealth Minister for the Environment and Water under s 28 of the EPBC Act.

We are also committed to consulting with aviation industry stakeholders about management of our heritage obligations, and to fulfil consultation obligations to other government agencies regarding heritage matters as specified in the EPBC Act. Properties that are, within the meaning of the EPBC Act, owned or controlled by Airservices are often located within the bounds of an airport.

Airport owners and operators may also have heritage management obligations that could impact or be impacted by our activities. Commonwealth-leased airports are administered by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) under the *Airports Act 1996*, and the Airport (Environment Protection) Regulations 1997 - which include provisions for protection of heritage values. Airservices carries out consultation with relevant government agencies on heritage matters at the relevant phase of the project/asset life cycle (planning, design, construction, operation and/or decommissioning).

Jurisdiction	Statutory body (bodies) responsible
Commonwealth	
<i>Air Services Act 1995</i>	Air Services, the Civil Aviation Safety Authority (CASA) and DITRDCA
<i>Australian Heritage Council Act 2003</i>	Department of Climate Change Energy, the Environment and Water (DCCEEW)
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Department of Climate Change Energy, the Environment and Water (DCCEEW)
<i>Environment Protection and Biodiversity Conservation (EPBC) Act 1999</i>	Department of Climate Change Energy, the Environment and Water (DCCEEW)
EPBC Regulations 2000	Department of Climate Change Energy, the Environment and Water (DCCEEW)
<i>Great Barrier Reef Marine Park Act 1975</i>	Great Barrier Reef Marine Park Authority
<i>Airports Act 1997</i>	Department of Infrastructure, Transport, Regional Development, Communications and the Arts
<i>Airports (Environment Protection) Regulations 1996</i>	Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Jurisdiction	Statutory body (bodies) responsible
Australian Capital Territory	
<i>Heritage Act 2004</i>	Environment, Planning and Sustainable Development Directorate (ACT Heritage)
<i>Planning Act 2023</i>	ACT Planning
New South Wales	
<i>Environmental Planning and Assessment Act 1979</i>	Department of Planning and Environment
<i>Heritage Act 1977</i>	Heritage Council of New South Wales / Department of Planning and Environment
<i>National parks and Wildlife Act 1974</i>	Department of Planning and Environment
Northern Territory	
<i>Heritage Act 2011</i>	Northern Territory Heritage Council / Department of Territory Families, Housing and Communities
<i>Northern Territory Aboriginal Sacred Sites Act 1989</i>	Aboriginal Areas Protection Authority
<i>Parks and Wildlife Commission Act 1980</i>	Department of Environment, Parks and Water Security
Queensland	
<i>Aboriginal Cultural Heritage Act 2003</i>	Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts
<i>Nature Conservation Act 1992</i>	Department of Environment, Science and Innovation
<i>Queensland Heritage Act 1992</i>	Department of the Environment, Science and Innovation
<i>Torres Strait Islander Cultural Heritage Act 2003</i>	Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts
<i>Planning Act 2016</i>	Department of Housing, Local Government, Planning and Public Works

Table 3 - Key Commonwealth, State and Territory environmental and heritage legislation

Jurisdiction	Statutory body (bodies) responsible
South Australia	
<i>Aboriginal Heritage Act 1988</i>	Department of Premier and Cabinet (First Peoples - State Relations Group)
<i>Heritage Places Act 1993</i>	Department of Environment and Water
<i>National Parks and Wildlife Act 1972</i>	Department of Environment and Water
Tasmania	
<i>Aboriginal Heritage Act 1975</i>	Aboriginal Heritage Tasmania
<i>Historic Cultural Heritage Act 1995</i>	Tasmanian Heritage Council / Heritage Tasmania
<i>National Parks and Wildlife Act 1972</i>	Tasmania Parks and Wildlife Service (Department of Natural Resources and Environment Tasmania)
Victoria	
<i>Aboriginal Heritage Act 2006</i>	Department of Premier and Cabinet, First Peoples - State Relations
<i>Heritage Act 2017</i>	Heritage Victoria (Department of Transport and Planning)
<i>National Parks Act 1975</i>	Parks Victoria (Department of Energy, Environment and Climate Action)
Western Australia	
<i>Aboriginal Heritage Act 1972</i>	Department of Planning, Lands and Heritage
<i>Conservation and Land Management Act 1984</i>	Department of Biodiversity, Conservation and Attractions
<i>Heritage Act 2018</i>	Department of Planning, Lands and Heritage

2.4.2 Community

Community interest in Airservices heritage issues, particularly in relation to changes in aviation-related technology, is well-recognised. Consequently, consultation and liaison with the community is an important aspect of identifying heritage values and addressing potential conflicts, prior to undertaking an activity or management regime.

Of the approximately 1,000 sites owned or controlled by Airservices, many are located in areas of environmental sensitivity such as National Parks, World Heritage sites and reserves. In addition, several places owned or controlled by Airservices are subject to Native Title claim. These and other places under our control may have Indigenous heritage values and maintaining or providing access to these sites requires an awareness of Indigenous or potential Indigenous heritage considerations.

In 2021 we updated the Airservices Reconciliation Action Plan (RAP). The plan includes focus areas and actions relating to community engagement with Aboriginal and Torres Strait Islander people, as well as the enhancement of cultural awareness and understanding within Airservices. Activities under the RAP, including the establishment of principles and plans, will assist in guiding engagement relating to the management of Indigenous heritage places and values.

Where a place may have Indigenous heritage values or sensitivity, we are committed to consulting with the local Indigenous group(s) and will be guided in our approach to consultation by the following documents:

- Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), Commonwealth of Australia, February 2016*; and
- Interim Engaging with First Nations People and Communities on Assessments and Approvals under the *Environment Protection and Biodiversity Conservation Act 1999, Commonwealth of Australia, 2023*

We will also keep abreast of outcomes from the review of the EPBC Act as they may influence First Nations engagement protocols and policies.

Table 4 below provides a list of potential historic and Indigenous community stakeholders on heritage matters. Community consultation undertaken for a particular proposal will depend on the nature of the project and would focus on groups with a particular interest in the subject property, and groups who may be affected by changes to and management of the place.

Historic heritage

- National Trust of Australia (relevant State or Territory branch)
- Local historical society (where one exists)
- Aviation historical society (relevant state or territory)
- Local aviation museum or gallery (where one exists)

Indigenous heritage

- Relevant Traditional Owner or Custodian Representative Group
- Prescribed Body Corporate/Registered Native Title claimants
- Local Indigenous organisations

Table 4 - Examples of potential stakeholders

2.4.3 Strategy implementation and actions

Strategy implementation	Actions
We will consult with relevant internal/external staff/agencies/owners and community groups to ensure heritage obligations are met and issues of concern are addressed	Consult with relevant National, State/Territory and Local Government authorities at the outset of projects where the Commonwealth Heritage values or Indigenous values of a place may potentially be impacted.
	Identify stakeholder community groups, including Indigenous groups, for each place owned or controlled by Airservices, where our actions may potentially result in impacts of concern to them.
	As appropriate, consult or seek heritage advice from the Commonwealth Department of Climate Change, Energy, the Environment and Water, and with the Commonwealth Minister for the Environment and Water through mechanisms provided in the EPBC Act.
	As appropriate, consult with Government agencies that own or have management responsibility for heritage listed places about proposed actions which may have negative impacts on the heritage values of those places.
	As appropriate, consult with Government agencies that own or have management responsibility for heritage listed places, about proposed actions which may have negative impacts on the heritage values of those places.
	For actions involving a Commonwealth Heritage place, undertake community consultation and liaison in accordance with the place's management plan. Where a plan does not exist, consultation will be consistent with the Commonwealth Heritage management principles.

2.5 Conflict resolution

As specified previously, Section 9(1) of the *Air Services Act 1995* states that, 'in exercising its powers and performing its functions, Airservices must regard the safety of air navigation as the most important consideration'.

Subject to that core obligation with respect to safety, s 9(2) requires Airservices to, 'exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, the environment is protected from the effects of, and the effects associated with, the operation and use of aircraft.' Consequently, in seeking the resolution of any conflict, we will ensure that the final outcome provides for safe air navigation and related airside services to the aviation industry, the travelling public and the community.

In instances where conflicts may arise, we are committed to implementing a conflict resolution mechanism in a timely and effective manner. We will make efforts to resolve the conflict in order to avoid the possibility of taking an action that will have a significant impact on the heritage values of places with Commonwealth Heritage values. After the conflict reaches a conclusion, we will record the reasons for the decision.

Conflicts arising from the assessment and management of heritage values on Airservices' properties could occur when:

- Attempting to manage different heritage values;
- Attempting to manage heritage values and meet operational obligations, particularly where both requirements are statute driven; and/or
- Opinions differ between government agencies, Indigenous groups, land and lease holders or stakeholder community groups on the heritage values of a place and the management of those values.

In instances where the conflict arises due to the management of differing heritage values, the resolution process will utilise one or more of the following techniques depending on the significance of the issue:

- Advice from experts in the relevant heritage management field;
- Reference to heritage guidelines such as The Burra Charter (Australia ICOMOS 2013), Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*, and Interim Engaging with First Nations People and Communities on Assessments and Approvals under the *Environment Protection and Biodiversity Conservation Act 1999*; and/or
- Advice from the Commonwealth Department of Climate Change, Energy, the Environment and Water.

Where conflict arises between the management of heritage values and operational requirements, the resolution will be undertaken using one or more of the following measures depending on the significance of the issue:

- Reference to Airservices legal obligations under the *Air Services Act 1995* and applicable lease provisions for the place in question;
- Advice from experts in the relevant heritage management and operational fields;
- Reference to heritage guidelines such as The Burra Charter (Australia ICOMOS 2013);
- Reference to heritage guidelines such as The Burra Charter (Australia ICOMOS 2013), Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*, and Interim Engaging with First Nations People and Communities on Assessments and Approvals under the *Environment Protection and Biodiversity Conservation Act 1999*; and/or
- Referral of the proposed action to the Environment Minister for advice under the terms of the EPBC Act.

We will seek to reduce potential conflicts by consulting with relevant stakeholders on proposed activities and impact mitigation measures.

2.6 Monitoring, reviewing and reporting with regard to the Heritage Strategy

The Heritage Strategy is monitored and reviewed on a regular basis as part of our commitment to maintaining an up-to-date EMS.

The Heritage Strategy has been reviewed every three years since the initial strategy was prepared in 2010, and the reviewed and updated document, together with a triennial report, is lodged with the Commonwealth Minister for the Environment and Water.

2.6.1 Strategy implementation and actions

Strategy implementation	Actions
We will ensure the implementation of the Heritage Strategy is monitored, reviewed and reported in accordance with the EPBC Act and EPBC Regulations, and our internal EMS.	Produce an annual report on the implementation of the Heritage Strategy to the executive.
	Prepare a triennial report for lodgement along with the Heritage Strategy.
	Undertake a review of the Heritage Strategy in 2026, prior to preparation of the updated Strategy for the next period.

3.0 Identification and assessment of commonwealth heritage values

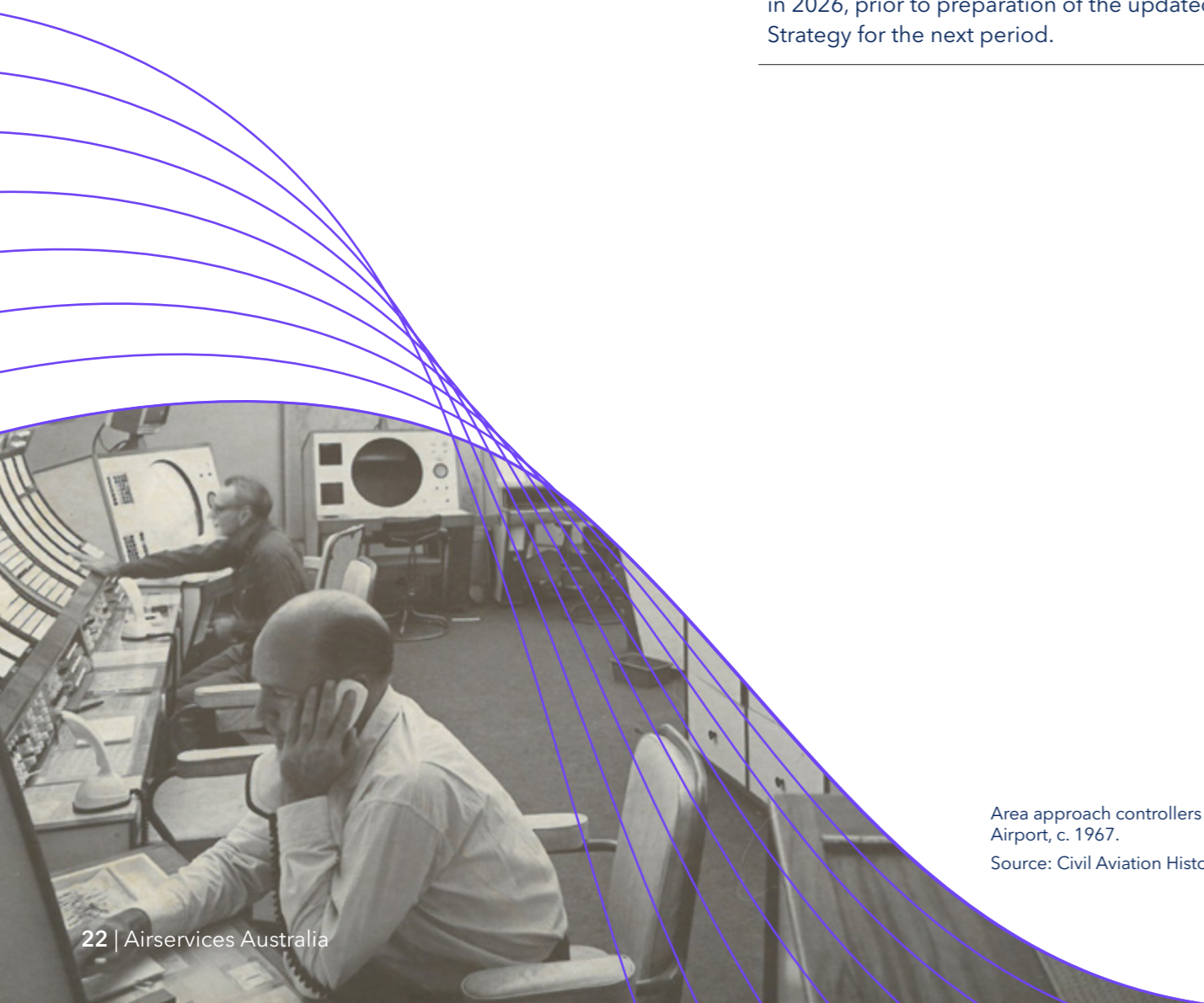
Airservices owns or controls approximately 1,000 places, including ATC towers, fire stations, navigational aids ('navaids'), radar facilities, training centres, offices, fire training grounds, engineering and vehicle workshops, and former flight service centres. It is recognised that the use of a place or the activities it performs can contribute to its heritage significance. As such, the properties we own or control may have had activities or operations that contributed to their heritage value.

We completed a national assessment of the Commonwealth Heritage values of ATC towers in 2007-09. Assessment of navaids was completed in 2013/14 and an assessment of fire stations was completed in 2012. These places have been assessed against the criteria for Commonwealth Heritage values as provided in Regulation 10.03A(2) of the EPBC Regulations. Radar facilities are in the process of being assessed against the Commonwealth Heritage criteria. The identification and assessment process being undertaken for these places is summarised in Section 3.1.1 below.

Schedule 7C of the EPBC Regulations specifies that a Heritage Strategy must include matters relating to the identification and assessment of Commonwealth Heritage values, including the following:

- a. An outline of the process for identifying and assessing the Commonwealth Heritage values of all agency property;
- b. A statement of the timeframes for the completion of:
 1. The agency's heritage identification and assessment program (s 4.1.4);
 2. The agency's register of places and their Commonwealth Heritage values (s 5.1.1); and
 3. The agency's report to the Minister, that includes details of the program and a copy of the register (s 5.6.1).

We have adopted a thematic approach to the identification and assessment of Commonwealth Heritage values for places owned and controlled by Airservices. ATC Towers, Fire Stations and Navigation Aids have undergone identification and assessment for Commonwealth Heritage values since 2007.



Area approach controllers at Sydney Airport, c. 1967.
Source: Civil Aviation Historical Society

3.1 Future identification and assessment

We propose to continue the thematic approach to heritage assessments during 2024–26, focusing on completing assessments of radar facilities.

3.1.1 Radar facilities

We are part of the way through a staged process of assessing Civil Aviation Radar Sites. Stage 1 included a report that identified the major phases in the development of radar and its application in the context of civilian air transport (1945–present). Work carried out during this stage also identified a narrow group of facilities of heritage interest (potential for CHL listing) that may be representative of an initial rollout of Australia’s route surveillance radar program from the late 1960s to the early 1970s.

The proposed Stage 2 will include two parts:

- Part 1: Archival research at the National Archives of Australia in Canberra, and an initial site visit to Mount Majura, ACT radar unit
- Part 2: Balance of field programme (sites to be confirmed in Part 1) and completion of detailed Assessment report.

3.1.2 Detailed heritage assessments

Airservices will continue to assess places in which heritage interests and considerations are identified, as required. In undertaking that work we will apply existing processes, as previously implemented.

Detailed assessment (Detailed Heritage Assessment, or DHA) of sites that warrant assessment will involve historical research and comparative analysis, a physical survey and inspection, and assessment of the place against the criteria identified in Section 341D of the EPBC Act ‘Meaning of Commonwealth Heritage values’.

Consideration will be given to the threshold or level of significance for which a criterion is satisfied. There are four broad levels of heritage significance: world heritage significance, national heritage significance, state/territory heritage significance and local significance. It is usual that a place that demonstrates any level of significance is also considered to be of local significance. Places can be included in the Commonwealth Heritage List if they satisfy any level of significance, including local significance.

If the assessment of the place determines that one or more of the Commonwealth Heritage criteria has been met, the place will be considered to hold Commonwealth Heritage value.

This will affect future processes for actions including management, adaption and divestment.

3.1.1 Strategy implementation and actions

Strategy implementation

Actions (with timeframes)

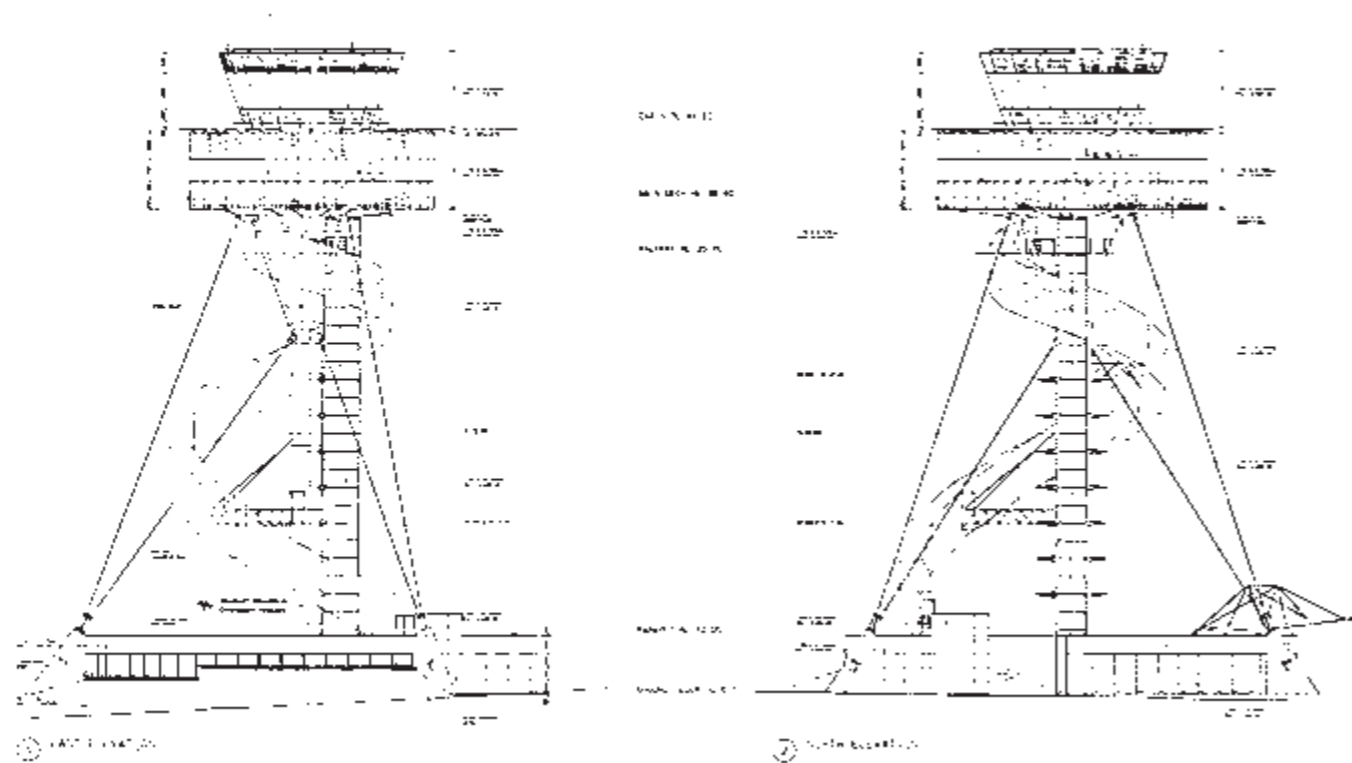
We will continue to conduct a programme, in accordance with s.341ZB(1)(a) of the EPBC Act, to identify and assess the Commonwealth heritage values of places owned or controlled by the organisation.

Complete Stage 2 of the radar study

Other assessments as required

Interior of the cabin that originally surmounted the Operations and Administration Building at Parafield Airport, Adelaide, 1947.
Source: Civil Aviation Historical Society

4.0 Management of Commonwealth Heritage values



East and north elevations of Sydney no. 5 air traffic control tower, 1993.
Source: Airservices Australia

We are committed to managing and protecting the places we own or control that have Commonwealth Heritage value.

The following section addresses the matters relating to the management of Commonwealth Heritage values that must be included in a Heritage Strategy, as identified in Schedule 7C, s 3 of the EPBC Regulations:

- a. A description of how the agency's heritage places register will be maintained, updated and made accessible to the public;
- b. A statement of the time frame for the preparation of management plans for the agency's Commonwealth Heritage places;
- c. An outline of the existing use, by the agency, of places with Commonwealth Heritage values;
- d. An outline of current or expected development, works, disposal or other proposals that may affect Commonwealth Heritage values;
- e. An outline of the process to ensure that Commonwealth Heritage values are considered in the agency's planning for future development, works, divestment or other proposals;
- f. A plan and budget for the maintenance and long-term conservation of Commonwealth Heritage values;
- g. An outline of the process by which the success of the agency in conserving Commonwealth Heritage values will be monitored and reviewed..

4.1 Heritage places register

The EPBC Act requires that Airservices develops a heritage place register that identifies the Commonwealth Heritage values for each place it owns or controls (s 341ZB(1)(b)).

Our register of CHL places currently contains six air traffic control towers and is publicly accessible through our website at <https://www.airservicesaustralia.com/community/environment/sustainability/heritage/heritage-register/>.

A register of places with potential CHL values is available internally as an electronic database and is updated in response to assessments. This register will be updated as CHL status changes, or assets move into or out of our control or ownership.

4.1.1 Strategy implementation and actions

Strategy implementation	Actions
We will maintain the Airservices Commonwealth heritage register in a publicly accessible location (Airservices external website) and update as required.	Maintain the register as an electronic database (ongoing)
	Update the register to include all places with heritage values to align with outcomes of the assessment programme (as required, 2024-26)
	Ensure the information gained from environmental site audits, assurance programmes, document reviews, new/ updated management plans and so forth are reviewed against heritage register entries (ongoing)
	Review cyclically to ensure that information exchange exists between the heritage register, the environmental risk register, environmental manifests and our estate management procedures (ongoing)

4.2 Heritage management plans

Section 341S of the EPBC Act requires Commonwealth agencies to prepare a written management plan to protect and manage the Commonwealth Heritage values of a place it owns or controls. Management plans prepared for Commonwealth Heritage places, that is, those places that are included on the Commonwealth Heritage List, must meet the requirements provided in Schedule 7A of the EPBC Regulations.

The HMPs for the six ATCs on the Commonwealth Heritage List are to be reviewed in the 2024-2026 period, according to s. 341X of the EPBC act, which requires a review of plans within five years of completion. The existing HMPs were finalised in 2020 (Sydney Air Traffic Control Tower No. 5) and 2021 (Bankstown, Essendon, Hobart, Launceston and Parafield).

4.2.1 Strategy implementation and actions

Strategy implementation	Actions
We will, in accordance with the EPBC Act, prepare and implement management plans for places we own or control that are on the Commonwealth Heritage List.	Continue to progress the review and endorsement of HMPs for all places included in the CHL.
	The Environment and Sustainability function will monitor the implementation of HMPs for Commonwealth Heritage places.

4.3 Use of places with Commonwealth Heritage values

Currently, the majority of places owned or controlled by Airservices which have a heritage listing or Commonwealth Heritage values are used for operating navigational equipment (such as radio navigation aids) and communication facilities for the aviation industry. In addition, at a number of airports with heritage values we are responsible for providing air traffic control and/or firefighting services, which includes the management of operational control towers, aviation rescue and firefighting infrastructure and equipment and associated support facilities.

A comprehensive understanding of both current and past activities on Airservices properties is important when identifying and assessing current environmental risks and heritage impacts, and in developing appropriate management practices to minimise those risks and impacts.

4.3.1 Strategy implementation and actions

Strategy implementation	Actions
We will provide a summary of the history and current use of each place in our heritage places register.	In accordance with Regulation 10.03G (2) (e) of the EPBC Regulations, the Airservices heritage places register will include a sequential description of the use of each place entered in the register.
	In the preparation of HMPs for Airservices places with Commonwealth Heritage values, we will identify the past, present and proposed uses of the places. Current and proposed uses will be taken into account when assessing potential impacts and developing mitigation measures in those plans.

4.4 Future management of Commonwealth Heritage values

Our EMS protocols provide a framework for the identification and management of current or expected development, works, divestment or other proposals that may affect the Commonwealth Heritage values of places owned or controlled by Airservices.

For places included in the CHL, the HMP provides a specific management framework to protect the Commonwealth Heritage values of the place.

4.4.1 Process for consideration in planning for future development, works and divestment

We have numerous development activities around Australia at varying stages of planning or implementation.

Our EMS includes procedures in relation to assessing the risks associated with development activities. As part of these processes, there is a requirement during the initiation phase of project development to conduct an environmental assessment to identify potential impacts of the project on known heritage value. Relevant findings from any assessments of heritage value will be entered into our heritage places register, with this information to be made available to project managers for inclusion in their project planning. Potential impacts on heritage values will also be entered into the environment risk register.

For properties included in the CHL, we will comply with the EPBC Act and take all measures to mitigate the impact of the action (change activity) on the Commonwealth Heritage values. Project managers are required to seek advice from the Airservices Environmental Advisor where:

- Insufficient information is available to make informed decisions on likely risks to heritage values resulting from proposed actions; and /or
- Risks identified through the operation of this strategy, EMS protocols, environment risk register or management plans indicate proposed actions are likely to have a significant impact on heritage values.
- Where appropriate, seek early advice from a qualified heritage specialists and the Department and refer the action for a decision by the Commonwealth Minister for the Environment and Water when necessary.

In the case of divestment of a Commonwealth Heritage place, we will comply with s 341ZE of the EPBC Act, including:

- The requirement to notify the Minister 40 days before executing the contract;
- Inclusion of a covenant in the contract to protect Commonwealth Heritage values (unless this is unnecessary, unreasonable or impracticable);
- Informing the Minister if the covenant would not or could not be made, before executing the contract; and
- The requirement to take reasonable steps to ensure the ongoing protection of Commonwealth Heritage values, as advised by the Minister

4.4.2 Strategy implementation and actions

Strategy implementation	Actions
We will develop and implement processes to ensure heritage values are considered early in project planning for development proposals, divestment and other actions	Continue to identify current or expected development, works, disposal or other proposals that may affect the Commonwealth Heritage values of places owned or controlled by Airservices and address via our EMS protocols and HMPs.

4.5 Budgeting for maintenance and conservation of heritage values

Our corporate governance policies ensure that financial budgeting accounts for costs involved in environmental legislation compliance. Protocols resulting from the financial policies require the identification of needs for funds and the process for developing effective budgets.

All projects must include, where necessary, funds to ensure the environment is appropriately managed in accordance with our legal and policy obligations. This will include addressing existing heritage values, and any values identified in the initiation phase of a project. In addition, management plans for Commonwealth Heritage places will identify and guide maintenance and capital work requirements as well as provide details on expenditure requirements for budgeting purposes (the property manager for the place is responsible for identifying and obtaining approval for required annual funds on an ongoing five-year funding cycle).

Airservices Office of the CEO currently provides sponsorship to the Civil Aviation Historical Society who manage and operate the Airways Museum at Essendon Airport. For many years, we have collected and preserved a range of equipment related to our business such as air traffic control consoles, radomes, fire trucks and navigation aids. This collection is managed and preserved in the current Airways Museum and, while largely historical in content, it houses equipment that may help illustrate Commonwealth heritage values of Airservices places.

4.5.1 Strategy implementation and actions

Strategy implementation	Actions
In accordance with our statutory obligations, we will ensure the maintenance and long-term conservation of Commonwealth Heritage values for places we own or control are included in planning and budgeting processes.	Plan for and include the requirements for heritage assessment and protection in the budget for the development and implementation of capital works projects.
	Identify expenditure for the maintenance and long-term conservation of Commonwealth Heritage values in our annual report.
	Review procurement processes to ensure environmental protection considerations and obligations are included within relevant contracts.

4.6 Monitoring and review

Airservices has an environmental assurance programme for places under its control. The assurance programme is conducted to assess the adherence to policy and procedures, as detailed in the EMS, and includes reference to heritage management plans prepared for places included in the CHL.

Non-compliance issues identified through the environmental assurance programme are documented in our Corporate Integrated Reporting and Risk Information System database (known as CIRRIIS), with corrective actions determined and monitored.

Issues considered as being significant (for example, non-compliance with legislation or issues of public sensitivity) will be reported to the Chief Safety and Risk Officer, Executive and the Board.

The success of conserving heritage values of Commonwealth Heritage places owned or controlled by Airservices will be monitored and reported in accordance with management plans for those places (refer to clause (h)(ix), Schedule 7A of the EPBC Regulations).

4.6.1 Strategy implementation and actions

Strategy implementation	Actions (with timeframe)
We will monitor and report on our success in conserving the Commonwealth heritage values of places we own or control through protocols and benchmark criteria outlined in our EMS.	Integrate heritage management into our annual environmental assurance programme. Complete the Report to the Minister on progress under this Heritage Strategy 2024-26 (complete 2027)

5.0 Training and Promotion

We are committed to providing training for staff in relation to environmental management and heritage matters, and in promoting the Commonwealth Heritage values of places that we own or control.

This section addresses the matters relating to Commonwealth Heritage training and promotion which must be included in a Heritage Strategy, as identified in Schedule 7C, Regulation 10.03E, s 4 of the EPBC Regulations:

- a. A program for the training of agency staff about Commonwealth Heritage obligations and best practice heritage management;
- b. A program for promoting community awareness of Commonwealth Heritage values, as appropriate.

5.1 Staff training

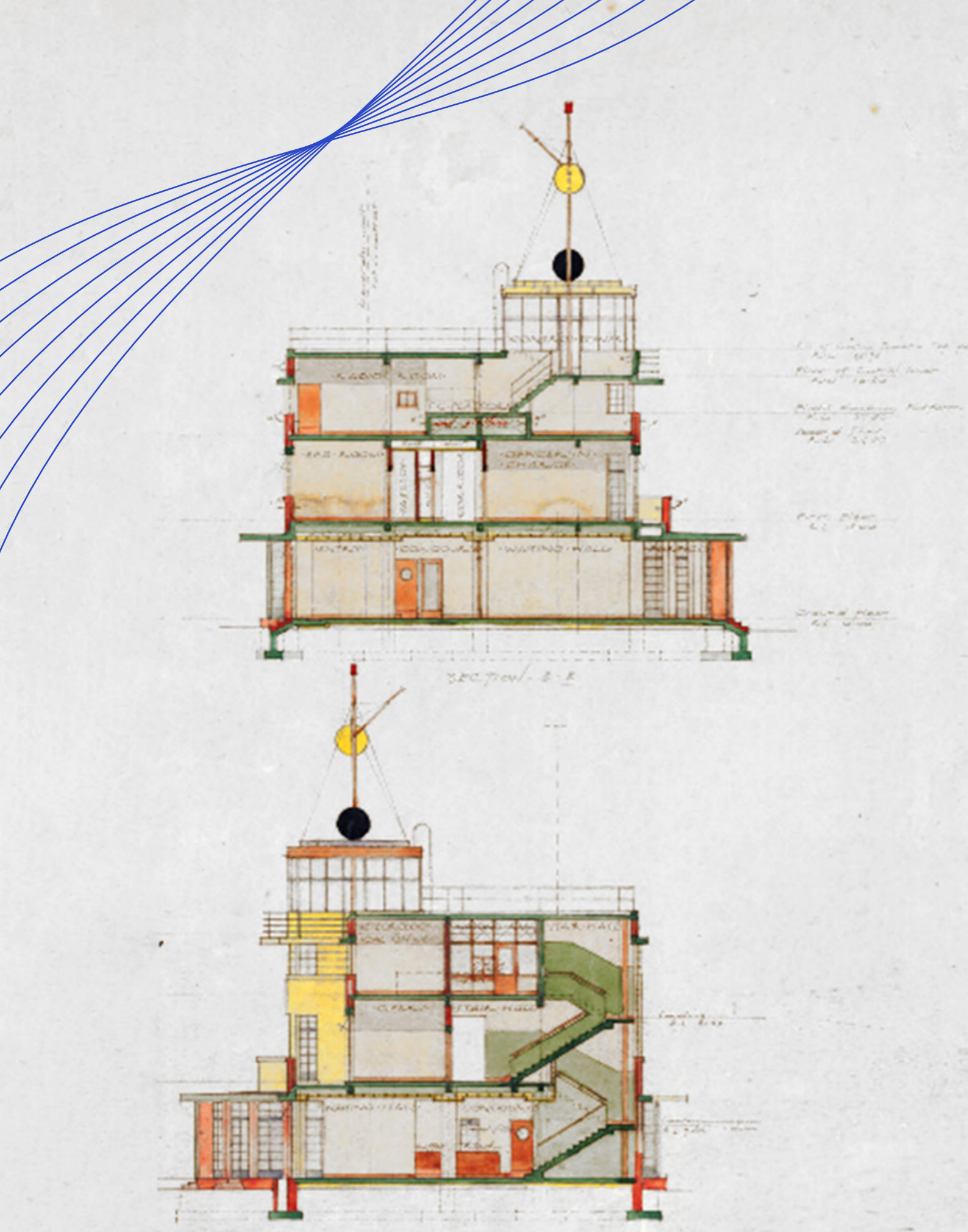
The quality of decision making in relation to heritage issues relies on the availability of information about the places Airservices owns or controls. We recognise the need to raise awareness and understanding of heritage issues among managers and staff, and to achieve more effective integration of heritage management within our existing EMS and organisational structure.

Our Environmental Management System Objectives and Requirements national operational standard establishes the standards for staff training, awareness and competence. We have a rolling annual programme of environmental awareness training, including for heritage, that we conduct at the corporate level and maintain in a register in accordance with the EMS.

To this aim, we maintain information on our systems regarding the management of environmental and heritage requirements. This includes a detailed heritage page with information on Commonwealth Heritage and links to the Heritage Strategy and Heritage Register.

5.1.1 Strategy implementation and actions

Strategy implementation	Actions
We will integrate heritage management awareness training into its ongoing environment training programme.	Continue to provide training regarding heritage management awareness as part of our environment training program.



Sections through 'Proposed Control Building for [Australian] Capital City Aerodromes', 1940.
Source: National Archives of Australia

5.2 Community awareness

Community awareness of Airservices environmental and heritage issues, operations and environment management is primarily undertaken through our website, media releases, social media, conferences and associated workshops. Where appropriate, information about the conservation and management of places with Commonwealth Heritage values will be available through our website, our heritage register or the relevant HMP. We are committed to making information on the Commonwealth Heritage values of places we own or control available to the community (subject to issues of confidentiality), for education and awareness purposes.

Most of this information is also available on the Department of Climate Change, Energy, the Environment and Water's CHL website (<https://www.dcceew.gov.au/parks-heritage/heritage/places/commonwealth-heritage-list>).

It is noted that for security and safety reasons, access by the public to operational Airservices sites is restricted.

We contribute to awareness of heritage values through the continued sponsorship and support for the Airways Museum at Essendon Airport and also as an industry partner for Heritage of the Air Linkage project that investigated how aviation has transformed Australian society over the last 100 years. We also donate decommissioned equipment with heritage value to the museum.

We continue to support the University of Canberra Connecting the Nation website. The website highlights the alliances which have shaped Australia's aviation, and indicates where to find aviation heritage collections and historic sites. Over the current period, we plan to contribute content to the portal in the form of archival digital recordings of nav aids.

5.2.1 Strategy implementation and actions

Strategy implementation

We will provide and support publicly accessible information with regard to the Commonwealth Heritage values of the places it owns or controls

Actions

Continue to regularly update the information provided on the Airservices heritage webpage to provide information about current projects to the community.

For upcoming capital works projects, develop focused information strategies to inform and consult with key community stakeholders.

Continue to provide information to the relevant heritage and historical societies, including the Civil Aviation Historical Society, Connecting the Nation website and the Department of Climate Change, Energy, the Environment and Water.

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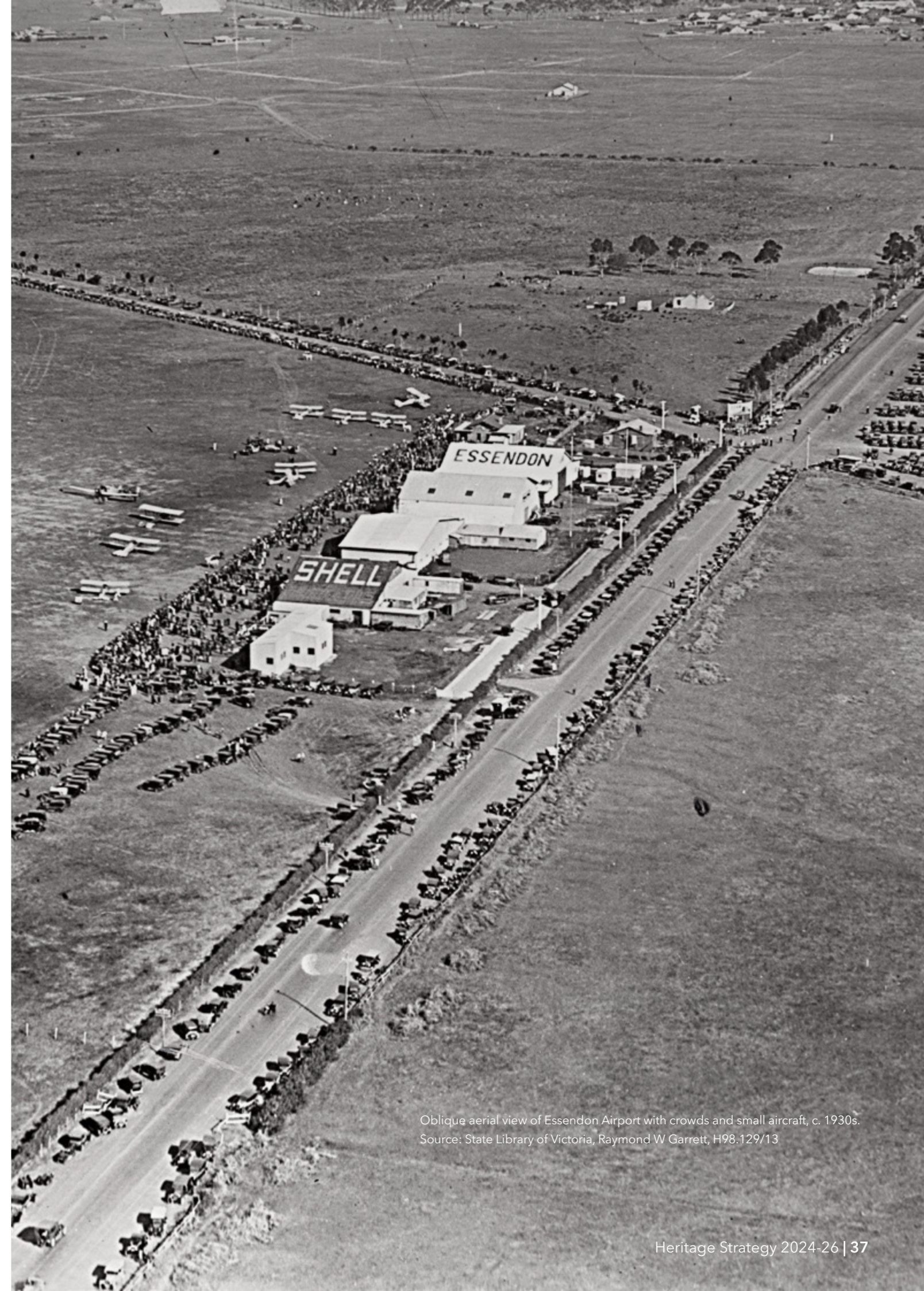
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Oblique aerial view of Essendon Airport with crowds and small aircraft, c. 1930s.
Source: State Library of Victoria, Raymond W Garrett, H98.129/13



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